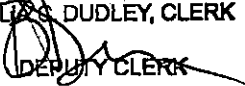


IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

MAY 21 2020

JULIUS DUDLEY, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA

v.

KUNTA KINTE DANIELS

Criminal No. 4:200216

All in violation of:

Title 18 U.S.C. § 924(c)(1)(A)

Title 21 U.S.C. § 841(a)(1)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about March 10, 2020 in the Western District of Virginia, KUNTA KINTE DANIELS did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.
2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO

The Grand Jury further charges that:

3. On or about March 10, 2020 in the Western District of Virginia, KUNTA KINTE DANIELS did knowingly and intentionally possess with intent to distribute 28 grams or more of a mixture and substance containing a detectable amount cocaine base, a Schedule II Controlled Substance.

4. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

The Grand Jury further charges that:

5. On or about March 10, 2020, in the Western District of Virginia, KUNTA KINTE DANIELS did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

6. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOUR

The Grand Jury further charges that:

7. On or about March 10, 2020, in the Western District of Virginia, KUNTA KINTE DANIELS did knowingly possess firearms, to wit, a i) New Frontier Armory model LW-15 multi-caliber rifle; ii) Remington Arms Company model 870 express magnum 12-gauge shotgun; iii) Glock model 34 9mm pistol; and iv) Sig Sauer model SP 2022 9mm pistol, in furtherance of

a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Counts One, Two and Three of this Indictment.

8. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE

9. Upon conviction of one or more of the felony offenses alleged in this Indictment, the Defendant shall forfeit to the United States:

- a. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

10. The property to be forfeited to the United States includes but is not limited to the following property:

a. Firearms and Ammunition

- i. New Frontier Armory model LW-15 multi-caliber rifle;
- ii. Remington Arms Company, model 870 Express magnum 12-gauge shotgun;
- iii. Glock model 34 9mm pistol;
- iv. Sig Sauer model SP 2022 9mm pistol;
- v. Associated ammunition and magazines.

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

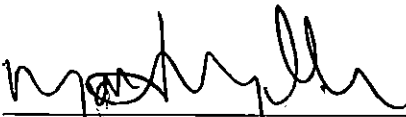
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to

the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 21 day of May, 2020.

s/Grand Jury Foreperson
FOREPERSON


FOR THOMAS T. CULLEN
UNITED STATES ATTORNEY